

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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**VIKRAM P. GROVER d/b/a
“IX ADVISORS” a/k/a “IXA,”**

Plaintiff,

v.

**NET SAVINGS LINK, INC., a
Colorado corporation and formerly
organized as a Nevada corporation,
WILTON GROUP, LIMITED, as
registered in the Isle of Man, U.K.,
WILTON UK (GROUP), LIMITED, as
registered in England and Wales, U.K.,
CHINA FOOD AND BEVERAGE CO.,
a Colorado corporation, and
JAMES A. TILTON,**

Defendants.

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**Civil Action No. 1:21-CV-05054
Honorable Mary M. Rowland**

**PLAINTIFF’S MOTION TO STRIKE DEFENDANT JAMES TILTON’S JUNE 26, 2024
CORRESPONDENCE IN RESPONSE TO PLAINTIFF’S EMERGENCY MOTIONS**

NOW COMES the Plaintiff, Vikram P. Grover d/b/a IX Advisors a/k/a IXA (hereinafter the “Plaintiff,” or “Plaintiff Grover”), by and through his attorneys, and files his Motion to Strike Defendant James Tilton’s June 26, 2024 correspondence entitled “Defendants Response to Plaintiff Vikram Gover’s Emergency Motion for Temporary, Preliminary and/or Equitable and Injunctive Relief and Specific Performance Against Defendants and Defendant-Agents” (the “Response”), as filed with this Court on June 26, 2024. In support thereof, Plaintiff states as follows:

- On June 21, 2024, the Plaintiff filed two Emergency Motions with this Court seeking Attachment and injunctive relief over the Defendants, Net Savings Link, Inc.

(“NSAV”) and James Tilton, and any and all Defendant-Agents. *See* Dkt. Nos. 161-163.

- On June 24, 2024, this Court, via a Minute Entry, scheduled a telephonic hearing on such Motions to be held on June 26, 2024 at 3:00 pm CT. *See* Dkt. No. 164.
- On June 26, 2024, shortly before the scheduled hearing, Defendant James Tilton emailed Ms. Dawn A. Moreno, Courtroom Deputy to the Honorable Mary M. Rowland, and attached a purported Response to the Plaintiff’s Emergency Motions.
- Defendant Tilton’s Response seeks to have this Court deny Plaintiff’s Emergency Motions as to all of the Defendants and Defendant-Agents.
- Indeed, Defendant Tilton’s Response has been filed on behalf of all of the Defendants, including Defendants NSAV, China Food and Beverage Co., Wilton Group, Limited, and Wilton UK (Group), Limited (hereinafter the “Corporate Defendants”).
- As none of the Defendants have engaged counsel, any filing on behalf of the Corporate Defendants by a non-attorney is inappropriate. As this Court stated in its June 24, 2024 Minute Entry: “Corporate defendants are reminded they may only appear through counsel.” *See* Dkt. No. 164.
- Thus, Defendant Tilton’s Response, filed on behalf of the Corporate Defendants, must be stricken by this Court, as Defendant Tilton is not an attorney representing the Corporate Defendants in this matter.

WHEREFORE, for all the foregoing reasons, the Plaintiff, Vikram Grover, respectfully requests this Court strike Defendant Tilton's June 26, 2024 correspondence entitled "Defendants Response to Plaintiff Vikram Gover's Emergency Motion for Temporary, Preliminary and/or Equitable and Injunctive Relief and Specific Performance Against Defendants and Defendant-Agents," and grant all other just and proper relief as may be deemed appropriate.

Dated: June 26, 2024

Respectfully submitted,
PLAINTIFF, Vikram P. Grover,
By his Attorneys,

/s/ Philip M. Giordano

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CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on this 26th day of June, 2024, I caused to be served a true and correct copy of Plaintiff Vikram Grover's Motion to Strike Defendant James Tilton's June 26, 2024 correspondence entitled "Defendants Response to Plaintiff Vikram Grover's Emergency Motion for Temporary, Preliminary and/or Equitable and Injunctive Relief and Specific Performance Against Defendants and Defendant-Agents," as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record, and by emailing a true copy of the same to Defendant James A. Tilton.

Dated: June 26, 2024

/s/ Philip M. Giordano
Philip M. Giordano